

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROBDARIUS WILLIAMS,

Defendant.

CAUSE NO. 1:22-CR-00063-JMS-MG

GOVERNMENT'S SENTENCING MEMORANDUM

The United States of America, by counsel, Zachary A. Myers, United States Attorney for the Southern District of Indiana, and Jeremy C. Fugate and Peter A. Blackett, Assistant United States Attorneys, hereby submit this Sentencing Memorandum in advance of the hearing presently scheduled for September 17, 2024. For the reasons stated in this Memorandum, the United States respectfully requests that the Court sentence WILLIAMS to a term of imprisonment of 124 months.¹

Exhibit 1



¹ Exhibit 1 is a picture from the AT&T robbery, which occurred on December 3, 2021.

I. THE DEFENDANT'S CRIMINAL CONDUCT

On December 3, 2021, Robdarius Williams took Quintez Tucker to retrieve an AR-15 style rifle. (PSR ¶ 6-9). While Tucker was retrieving the rifle, Williams stole a license plate from a nearby vehicle and subsequently put in on the car he was driving. (PSR ¶ 8). After successfully retrieving the license plate and firearm, Williams transported Tucker and another individual to an AT&T store, to commit an armed robbery. (PSR ¶ 9-15). After the armed robbery was complete, the robbers returned to William's vehicle and fled the scene. (PSR ¶ 15).

Exhibit 2



Exhibit 3



Exhibit 4

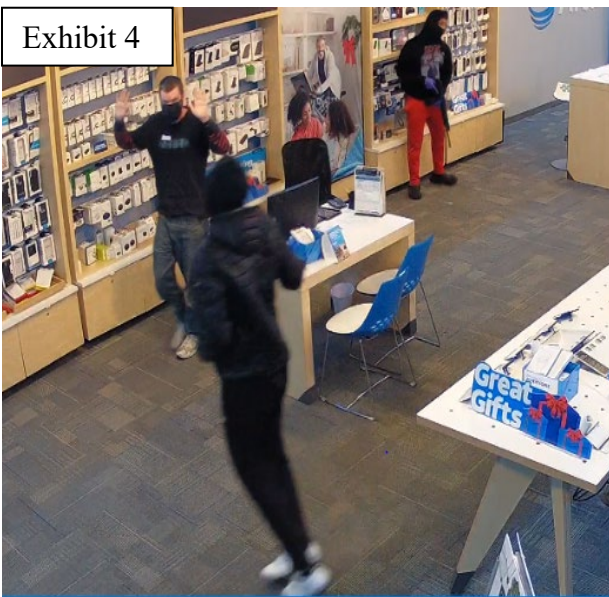
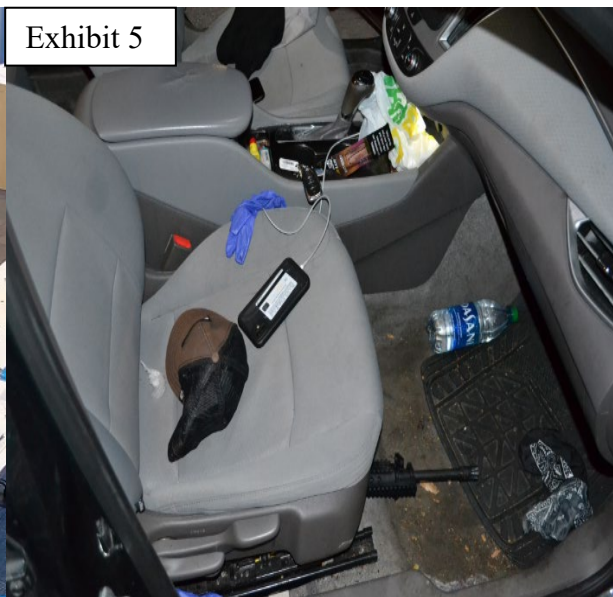


Exhibit 5



II. 18 U.S.C. § 3553(a) Factors

The § 3553(a) factors support a sentence of 124 months. Such a sentence is sufficient but not greater than necessary to meet the goals of sentencing.

a. Nature and Circumstances of the Offense

This case involves an armed robbery in the Indianapolis area, as described above. During the robbery, threats were made, firearms were brandished, employees became victims, and lives were changed forever. Armed robbery is a violent and dangerous crime. It forever changes the lives of the victims who experience the fear, anguish, and violence associated with being robbed while trying to earn a living.

In this case, the victim had a gun pointed at him and threats made towards him. While Williams may have not been the person committing the robbery, he was an essential and active participant. Without Williams, this robbery would have never occurred. Williams was essential to retrieving the firearm and acting as the driver before and after this robbery. Furthermore, he actively helped commit the robbery by stealing a license plate, which would help them avoid law enforcement detection, after the robbery was complete. Without Williams assistance, our victim would have never experienced the trauma and fear associated with this robbery.

Thus, given the violent nature of the offense, the harm caused to the victim, and William's substantial and active role in the commission of the offense, a sentence of 124 months is necessary.

b. History and Characteristics of the Defendant

This defendant does not have a significant criminal history. However, his conduct in this case establishes a blatant disregard for the law during this violent armed robbery. Here, the defendant was an essential member of a group that committed a robbery on December 3, 2021.

(PSR ¶ 6-15). During the robbery, the defendant helped secure a firearm and took two individuals to a store to commit a robbery. During that robbery, his associates threatened to harm the victim, pointed firearms at the victim, and changed his life forever. This defendant didn't just help his associates rob stores, he helped them robbed the victim of his ability to feel safe and secure while he worked to support himself.

The defendant's history demonstrates a total lack of respect for the law, the community, and public safety. Thus, a sentence of 124 months is necessary and would sufficiently account for the defendant's history and total lack of regard for the law.

c. Need for the Sentence to Reflect the Seriousness of the Offense, Promote Respect for the Law, and Provide Just Punishment

As discussed above, this is a serious offense. The danger and harm created by a robber with a firearm in the Southern District of Indiana is well-known. The sentence here carries with it a statutory maximum penalty of life imprisonment, which shows Congress' concern for this type of offense.

The need to promote respect for the law is important. Because of the serious nature and danger associated with this type of offense, a sentence of 124 months is necessary to provide just punishment.

d. The Need for Adequate Deterrence and to Protect the Public from Further Crimes of the Defendant

The defendant has inflicted trauma and turned a hard-working employee into a victim by working with this group to rob the AT&T store at gunpoint. This act of violence and terror displays a disregard for the law, establishes that he is a danger to the public, and shows that incarceration is necessary to protect the public.

A sentence of 124 months is necessary to keep the public safe from the defendant and to adequately deter him and other individuals who want to work with other people to commit armed robberies in our community from doing so in the future.

e. The Need to Provide the Defendant with Needed Training, Care, or Other Correctional Treatment

The defendant's history shows a need for both treatment and training. A sentence of 124 months would allow the defendant to obtain vocational training, which would help him obtain gainful employment upon his release. Additionally, anger management and mental health treatment would be beneficial, and the proposed sentence of 124 months would allow the defendant time to address these concerns while obtaining treatment and training.

f. The Need to Avoid Unwarranted Sentencing Disparities

A sentence of 124 months is necessary to avoid unwarranted sentencing disparities. This defendant actively worked with other individuals to terrorize a member of our community during the course of the robbery. His history of violent activity is short, but it is very serious and concerning. Thus, a sentence of 124 months is necessary to deter the defendant from committing crimes in the future and ensure that an unwarranted sentencing disparity does not occur.

III. CONCLUSION

Based on the foregoing, the United States respectfully requests that the Court sentence the defendant to a sentence of 124 months imprisonment.

Respectfully Submitted,

Zachary A. Myers
United States Attorney

By: /s/ Jeremy C. Fugate
Jeremy C. Fugate
Assistant United States Attorney

CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2024, the foregoing Government's Sentencing Memorandum was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

By: s/ Jeremy C. Fugate
Jeremy C. Fugate
Assistant United States Attorney